

TAKEROOT JUSTICE

February 5, 2020

VIA ECF

Hon. Ronnie Abrams, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square, Room 2203
New York, NY 10007

RE: Rahman et al. v. Red Chili Indian Cafe, Inc. et al.,
No. 17-cv-05156-RA-HBP

MEMO ENDORSED

USDC-SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 2/16/20

Dear Honorable Judge Abrams,

Our office with Gangat LLC represent the Plaintiffs in the above referenced matter. Pursuant to Your Honor's Individual Rules & Practices, we write regarding the upcoming February 10, 2020, 3:00 p.m. conference before Your Honor for Plaintiffs' Order to Show Cause for Default Judgment.

Unexpectedly, my co-counsel, Mohammed Gangat is not able to attend on February 10, 2020. As co-counsel, who represented Plaintiffs since the inception of the matter and also assisted Mr. Gangat with the preparation of the Order to Show Cause Default Judgment papers, I am fully familiar with the facts, legal issues, and damages of the case. As a result, I am ready to appear and proceed without Mr. Gangat on the substance of our papers with the exception of Mr. Gangat's request for attorneys' fees.

If the Court requires Mr. Gangat's appearance for the conference regarding Plaintiffs' Order to Show Cause for Default Judgment, then we respectfully request an adjournment of the conference date to when both Mr. Gangat and I are available. This is the first such request by the Plaintiffs.

Regarding conferring with Defendants, I attempted to reach Defendant Mohammed Mojnu Miah by phone at the number identified at the docket and left a voice message. I phoned Noor Islam at the number identified at the docket, and as I am also fluent in Bengali, communicated to him that there is a February 10, 2020, 3:00 p.m. Court conference date, of which he said he was aware and intended to appear. I then communicated the nature of this correspondence, and requested whether he would have any objection if the Court date was adjourned. Mr. Islam said he didn't have any objection and asked that I confer with Mr. Miah, with whom I already left a voice message. I also reminded him unless the Court determines otherwise, there is a Court conference on February 10, 2020 at 3:00 p.m. before Your Honor.

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Law, research, and
policy for organizing



A copy of this letter is being emailed to Mohammed Mojnu Miah's email address and also being sent to both individual Defendants via Priority Mail.

We thank the Court in considering this request and apologize for any inconvenience.

Very truly yours

/s/ S. Tito Sinha
S. Tito Sinha

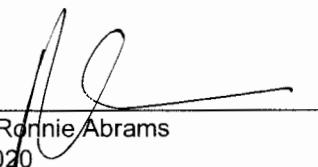
cc: Mohammed Mojnu Miah,
12151 Leland Avenue, Apt. 2F
Bronx, New York 10472 (via Priority Mail)
mmiah10166@gmail.com

Noor Islam
8 West 118th Street, Apt. 7B
New York, New York 10026 (via Priority Mail)

Mohammed Gangat, Esq.
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Mr. Sinha may appear on behalf of Plaintiffs. Accordingly, the conference regarding Plaintiffs' motion for default judgment will remain scheduled for February 10, 2020.

SO ORDERED.


Hon. Ronnie Abrams
2/6/2020